201-14381

NCIC HPV
Sent by: Mary-Beth Weaver

03/31/2003 02:45 PM

To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comment on Diisopropylbenzene category

Richard_Denison@environmentaldefense.org on 03/31/2003 02:22:38 PM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, Sonny_maher@americanchemistry.com
cc: MTC@mchsi.com, rdenison@environmentaldefense.org, kflorini@environmentaldefense.org

Subject: Environmental Defense comment on Diisopropylbenzene category

(Submitted via Internet 3/31/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Sonny_maher@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for the proposed Diisopropylbenzene Category.

The American Chemistry Council, through its Hydroquinone Precursors and Derivatives Panel, has submitted a Robust Summary/Test Plan to describe available data and testing needs for pure meta- and para-diisopropylbenzenes and a mixture of the three isomers (ortho-, meta- and para-) of diisopropylbenzene. The sponsor proposes that these chemicals be considered together as a category. Upon review of this submission and related information, we agree that these chemicals have very similar structures, as well as similar chemical/physical and toxicological properties. Therefore, we support their consideration as a category.

According to the sponsor, consumer and environmental exposure to the pure meta- and para- diisopropylbenzenes are limited by their sole use as industrial intermediates under closely monitored conditions. The isomer mixture, in addition to being used as a raw material for chemical manufacture, is a component in industrial cleaning formulations.

The sponsor maintains that occupational exposure to all of these chemicals is expected to be limited by the fact that they are manufactured and transported in closed systems. Significant environmental exposure appears to be unlikely except as a results of spills.

Whereas these chemicals are predicted to accumulate primarily in soil and to a lesser extent to water where they are stable, they are sufficiently volatile that they evaporate into air, where they rapidly degrade. Thus, environmental exposure is limited by the fact that there is limited potential for their release and if released as a result of a spill, they have low toxicity and are not predicted to persist.

This submission consists of a clearly written Test Plan supported by a well-organized Robust Summary. Available data describing the environmental and mammalian toxicity of chemicals in this category are somewhat limited; however, all available data and those provided for closely related compounds indicate chemicals in this category have low toxicity. While the data are limited, most of the requested SIDS elements have been addressed by existing studies or calculated by EPA approved methods. Given their very close chemical structural similarity, we feel that when data are available for one member of this category, they can reliably be used to

predict the relevant SIDS element for those members for which data are missing.

The only requested SIDS elements not addressed by actual data for one or more of the respective members of this category are Developmental Toxicity and Toxicity to Reproduction. These elements are supported, however, by an analysis of data presented for several closely related chemicals. Our review of these data indicate chemicals in this category would not be expected to induce either of these toxicities at doses that are not toxic to the dams. Thus, we support the use of SAR to address these SIDS elements and do not believe additional animal testing is necessary.

Minor comments:
1. There are two page 3s.
2. Certain pages of this submission will not print and page 6 of the appendix cannot be viewed on the computer.
3. Page 10: numerous SIDS elements are stated to have been obtained from "Reputable Textbooks". These references are given in the Robust Summary, but it would be helpful to have them in the Test Plan as well.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense